

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

Pursuant to Judge Patton's *General Practices and Procedures* (Revised August 11, 2023),  
Section VI(B)(1), Defendant hereby moves for an extension of time of 14 days for each of the  
following deadlines:

December 6, 2024 Motions for Summary Judgment

January 10, 2024 Responses to Motions for Summary Judgment.

The new deadlines would be December 20, 2024 for Motions and January 24, 2024 for responses. As grounds counsel for this motion Defendant would state that other pressing litigation matters that are approaching trial have unexpectedly prevented work on this matter. By email dated December 5, 2024, counsel for Plaintiff consented to the relief requested in this motion.

/s/ Jack B. Cooper

Jack B. Cooper (#0069321)  
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### **PROOF OF SERVICE**

This is to certify that on December 5, 2024, the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt, including counsel for Defendants listed below. Parties may access this filing through the Court's system. Served via the Court's ECF system to the parties listed below, who are on the ECF mailing list for this matter.

*/s/ Jack B. Cooper*  
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Jack B. Cooper (#0069321)